

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

JUDITH THIBEAU  
and GEORGE THIBEAU,  
Plaintiffs,

Docket No. 04-10643MLW

v.

UNITED STATES OF AMERICA  
and EAST BOSTON NEIGHBORHOOD  
HEALTH CENTER CORPORATION  
Defendants.

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASS.  
2005 SEP 30 P 4:14  
CLERK OF COURT

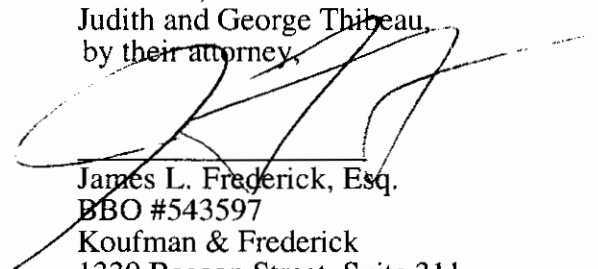
**PLAINTIFFS' EXPERT DISCLOSURE**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure plaintiffs offer a disclosure of their expected expert trial witnesses by reference to the attached exhibits A (report and resume of Herbert Eisenberg, AIA) and B (report and resume of Arthur Epstein, O.D., F.A.A.O.).

In addition to the information set forth in these exhibits, plaintiffs' attorney notes that Herbert Eisenberg charges \$120.00 per hour for his expert consultative services, has, as of 9/30/05 charged \$680.00 for consulting and preparing his report. Given this rate, plaintiffs anticipate incurring a cost of approximately \$750.00 to \$1,000.00 for further preparation and trial testimony of Mr. Eisenberg.

Furthermore, with regard to Dr. Epstein and his testimonial history over the last four years Dr. Epstein has advised that he has offered testimony within the last four years, that he himself is not sure of the names of such cases and that his office is searching his records to determine such information; and, further, that he expects his office will be able to produce the names of such cases within three weeks.

Plaintiffs,  
Judith and George Thibault,  
by their attorney,



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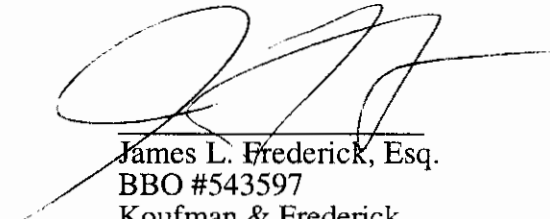
**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a Summons and copy of the Plaintiffs' Complaint were served upon the following parties, as required by Federal Rule of Civil Procedure, Rule 4(i), VIA HAND DELIVERY to:

Christopher Alberto, Esq.  
Assistant U.S. Attorney  
United States Attorney for The District of Massachusetts  
U.S. Courthouse, Suite 9200  
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DATED: 9/30, 2005



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